

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
MEMPHIS DIVISION**

KENNETH E. SAVAGE, JR.,)	
)	
Plaintiff,)	
v.)	
)	
FEDERAL EXPRESS)	
CORPORATION)	2:14-cv-02057-STA-dkv
d/b/a FEDEX EXPRESS and FEDEX)	
CORPORATION EMPLOYEES')	
PENSION PLAN,)	
)	
Defendants.)	

DECLARATION OF JOSEPH A. NAPILTONIA

I, Joseph A. Napiltonia, declare under penalty of perjury under the laws of the United States of America state that the foregoing is true and correct:

1. I am an attorney licensed to practice law in the State of Tennessee and a member in good standing of the Bar.
2. The facts contained herein are from my personal knowledge.
3. I represent Plaintiff Kenneth E. Savage, Jr. in the instant action.
4. On July 28, 2015, I emailed Terrence Reed, Esq., Defendants' counsel three spreadsheets detailing Mr. Savage's damages, including his retirement benefits.¹ See attached Exhibit A.
5. I also agreed to allow Mr. Reed to question my client *after Mr. Savage's deposition was completed* regarding those damages calculation spreadsheets via telephone while I was at FedEx's headquarters.

¹The damages spreadsheets were previously filed as Exhibit A to Second Declaration of Kenneth E. Savage, Jr. (Doc. 104-2)

Joseph A. Napiltonia

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